



Thilmany Mill 600 Thilmany Road Kaukauna, WI 54130

Mark Nessmann
Environmental Manager
P 920-766-8235
F 920-766-8708
mark.nessmann@experaspecialty.com

February 26, 2015

Ms. Michelle Farley
Air Engineer
Department of Natural Resources
2984 Shawano Avenue
Green Bay, Wisconsin 54313-6727

Mr. Manoj Patel
Air Enforcement and Compliance Assurance Branch (MI/WI)
US Environmental Protection Agency
Air and Radiation Division, Region 5
Chicago, IL 60604

**RE: Operation Permit No. 445031180-P12
2014 Annual Certification of Compliance Report**


Dear Michelle and Manoj:

Pursuant to Condition O.3.a.(4) on page 54 of the Part 70 Operation Permit,
Expera-Thilmany Mill is submitting its annual Certification of Compliance Report for 2014.


The number and letter references in this report correspond to the sections of the permit.

I certify that, based on information and belief formed after reasonable inquiry, the statements
and information in this document are true, accurate, and complete.

Sincerely,



Mark Nessmann
Environmental Manager



Lee R. Hammen
Mill Manager

makingbigideasfly™

EXP_000274

Expera Specialty-Thilmany Mill--- Operation Permit 445031180-P12				C=Calculations	M=Continuous Emissions Monitoring
Annual Compliance Summary				CPM= Continuous Parameter Monitoring	N= Notification
1/01/14 to 12/31/14				E= Emission Testing	P=Published Emission Factor
Part I.				F=Fuel Sampling and Analysis	Q=Quarterly Report
Compliance Status				I= Periodic Inspections	R=Recordkeeping
Permit Reference				J= Best Engineering Judgment	S=Standard Operating/Maintenance Procedure
In/Out					T= liquid sampling and analysis
Continuous or Intermittent Compliance				Method(s) used to determine compliance	
A.1.a.(1)	In		Continuous	E,R	11/21/13 stack test- .13 lbs./MMBTU
A.1.b.(1)	In		Continuous	S	
A.1.b.(2)	In		Continuous	E	11/21/13 stack test- .13 lbs./MMBTU
A.1.b.(3)	In		Continuous	CPM	Any deviations reported on semiannual monitoring report
A.1.b.(4)	In		Continuous	I,R	Last inspection - 4/7/14
A.1.c.(1)	In		Continuous	E	11/21/13 stack test- .13 lbs./MMBTU
A.1.c.(2)	In		Continuous	R	
A.1.c.(3)	In		Continuous	R	
A.1.c.(4)	In		Continuous	CPM,R	
A.1.b.(5)	In		Continuous	I,R	Last inspection - 4/7/14
A.1.b.(6)	In		Continuous	I	Any deviations reported on semiannual monitoring report
A.1.c.(5)	In		Continuous	CPM,R	
A.1.c.(6)	In		Continuous	R	
A.1.c.(7)	In		Continuous	R	Any deviations reported on semiannual monitoring report
A.2.a.(1)	In		Continuous	CPM,S	
A.2.b.(1)	In		Continuous	S,CPM,I,R	Redundant with conditions on p9
A.2.c.(1)	In		Continuous	E	No testing required
A.2.c.(2)	In		Continuous	R,CPM,R,I	Redundant with conditions on p9
A.3.a.(1)	In		Continuous	F,R	
A.3.a.(2)	In		Continuous	F,R	
A.3.b.(1)	In		Continuous	R	
A.3.c.(1)	In		Continuous	E	No testing required
A.3.c.(2)	In		Continuous	F	Redundant
A.4.a.(1)	In		Continuous	S	
A.4.a.(2)	In		Continuous	S	
A.4.b.(1)	In		Continuous	C, E	Not requested
A.4.c.(1)	In		Continuous	R	
A.4.c.(2)	In		Continuous	R	
A.4.c.(3)	In		Continuous	E	No testing required
A.5.a. (1) and (2)	In		Continuous	R	NA - not burning either TDF or residual fibers in this boiler
A.5.b.(1)	In		Continuous	E	NA - not burning TDF in this boiler
A.5.b.(2)	In		Continuous	E	NA not burning this fuel in this boiler
A.5.b.(3)	In		Continuous	F	not requested
A.5.b.(4)	In		Continuous	C	NA
A.5.c.(1)	In		Continuous	R	NA
A.5.c.(2)	In		Continuous	F	NA
A.5.c.(3)	In		Continuous	R	NA
B.1.a.(1)	In		Continuous	E,R	11/4/14 stack test - 0.06 lb/mmBtu
B.1.a.(2)	In		Continuous	E	11/4/14 stack test - 0.06 lb/mmBtu
B.1.a.(3)	In		Continuous	S,R	
B.1.a.(4)	In		Continuous	S,R	
B.1.b.(1)	In		Continuous	S,R	
B.1.b.(2)	In		Continuous	E	11/4/14 stack test
B.1.b.(3)	In		Continuous	CPM,R	
B.1.c.(1)	In		Continuous	E	11/4/14 stack test
B.1.c.(2)	In		Continuous	R	
B.1.c.(3)	In		Continuous	S	No new alternate fuels burned
B.1.c.(4)	In		Continuous	R	
B.1.b.(4)	In		Continuous	CPM	
B.1.b.(5)	In		Continuous	I,R	Last inspection 9/8/14
B.1.b.(6)	In		Continuous	I,R	Last inspection 9/8/14
B.1.b.(7)	In		Continuous	I,R	Any deviations reported on semiannual monitoring report
B.1.c.(5)	In		Continuous	I,R	
B.1.c.(6)	In		Continuous	R	
B.1.c.(7)	In		Continuous	R	
B.1.c.(8)	In		Continuous	R,S	

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Compliance Status				I= Periodic Inspections	R=Recordkeeping
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Continuous or Intermittent Compliance				Method(s) used to determine compliance	
B.1.b.(8)	In		Continuous	R	
B.1.b.(9)	In		Continuous	R	
B.1.c.(9)	In		Continuous	R	
B.2.a.	In		Continuous	M,R	Continuous except for periods reported in quarterly excess emission reports
B.2.b.(1)	In		Continuous	N,S	
B.2.c.(1)	In		Continuous	E	Method 9 testing done while opacity monitor out
B.2.c.(2)	In		Continuous	Q	
B.3.a.(1)	In		Continuous	M	
B.3.a.(2)	In		Continuous	M	
B.3.a.(3)	In		Continuous	F	
B.3.a.(4)	In		Continuous	F	
B.3.a.(5)	In		Continuous	S	
B.3.b.(1)	In		Continuous	S	
B.3.b.(2)	In		Continuous	S	
B.3.b.(3)	In		Continuous	S	always exhausting through 290' GEP stack
B.3.c.(1)	In		Continuous	E	No compliance emission testing was required during the reporting period.
B.3.c.(2)	In		Continuous	R	
B.3.c.(3)	In		Continuous	Q	
B.4.a.(1)	In		Continuous	C, S	
B.4.b.(1)	In		Continuous	S	
B.4.b.(2)	In		Continuous	S	
B.4.c.(1)	In		Continuous	R, C	
B.4.c.(2)	In		Continuous	R	
B.5.b.(1)	In		Continuous	S, R	
B.5.c.(1)	In		Continuous	E	No testing required
B.5.c.(2)	In		Continuous	R	
B.5.c.(3)	In		Continuous	R	
B.5.c.(4)	In		Continuous	R	
B.6.a.(1)	In		Continuous	R	
B.6.a.(2)	In		Continuous	S	
B.6.b.(1)	In		Continuous	F,R	
B.6.b.(2)	In		Continuous	R, C	
B.6.b.(3)	In		Continuous	E	
B.6.c.(1)	In		Continuous	R	
B.6.c.(2)	In		Continuous	R	
B.6.c.(3)	In		Continuous	F	
B.6.c.(4)	In		Continuous	R	
C.1.a.(1)	In		Continuous	P	
C.1.a.(2)	In		Continuous	S, R	
C.1.b.(1)	In		Continuous	R, S	
C.1.b.(2)	In		Continuous	R,S	
C.1.c.(1)	In		Continuous	E	No emission testing required.
C.1.c.(2)	In		Continuous	R	
C.2.b.(1)	In		Continuous	S	
C.2.c.(1)	In		Continuous	E	No emission testing required.
D.1.a.(1)	In		Continuous	E	11/6/14 stack test - 0.03 lb/mmBtu
D.1.a.(2)	In		Continuous	E	11/6/14 stack test - 0.03 lb/mmBtu
D.1.a.(3)	In		Continuous	P	
D.1.a.(4)	In		Continuous	E	11/6/14 stack test - 0.014 and 0.025 gr/dscf
D.1.a.(5)	In		Continuous	S	
D.1.a.(6)	In		Continuous	S	
D.1.b.(1)	In		Continuous	S	
D.1.b.(2)	In		Continuous	S	
D.1.b.(3)	In		Continuous	E	Last test 11/6/14
D.1.b.(4)	In		Continuous	CPM,R	
D.1.c.(1)	In		Continuous	E,S	

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Part I.	Compliance Status	Continuous or	Method(s) used to		
Permit Reference	In/Out	Intermittent Compliance	determine compliance		
D.1.c.(2)	In	Continuous	R		
D.1.b.(5)	In	Continuous	I	Last inspection 10/10/14	
D.1.b.(6)	In	Continuous	I		
D.1.b.(7)	In	Continuous	S,R		
D.1.c.(3)	In	Continuous	R		
D.1.c.(4)	In	Continuous	R		
D.1.c.(5)	In	Continuous	R		
D.1.c.(6)	In	Continuous	R		
D.1.c.(7)	In	Continuous	R		
D.1.c.(8)	In	Continuous	R		
D.2.a.	In	Continuous	M	Continuous except for periods reported in quarterly excess emission reports	
D.2.c.(1)	In	Continuous	E	Method 9 testing done while opacity monitor out	
D.2.c.(2)	In	Continuous	Q		
D.3.a.(1)	In	Continuous	R		
D.3.a.(2)	In	Continuous	T		
D.3.b.(1)	In	Continuous	E	Emission test on 6/27/13- 105.1lbs.SO2/hr	
D.3.b.(2)	In	Continuous	R, C		
D.3.c.(1)	In	Continuous	S		
D.3.c.(2)	In	Continuous	F		
D.4.a.(1)	In	Continuous	S		
D.4.a.(2)	In	Continuous	S		
D.4.b.(1)	In	Continuous	C, S	Not requested	
D.4.b.(2)	In	Continuous	S		
D.4.c.(1)	In	Continuous	R		
D.4.c.(2)	In	Continuous	R		
D.4.c.(3)	NA	Continuous	E	No testing required	
D.5.a.	In	Continuous	E	Emission test on 6/27/13; 2.5 ppmv	
D.5.b.(1)	In	Continuous	E	Emission test on 6/27/13; 2.5ppmdv	
D.5.c.(1)	In	Continuous	S		
D.6.a.(1)	In	Continuous	E	11/6/14 stack test - 0.014 and 0.025 gr/dscf	
D.6.b.(1)	In	Continuous	E,CPM,R	Redundant - same as O.8	
D.6.c.(1)	In	Continuous	S	New B side COM installed 10/2014	
D.6.c.(2)	In	Continuous	E,CPM,R	Redundant - same as O.8	
E.1.a.(1)	In	Continuous	E		
E.1.a.(2)	In	Continuous	E		
E.1.b.(1)	In	Continuous	S		
E.1.b.(2)	In	Continuous	CPM,R		
E.1.b.(3)	In	Continuous	I	Last inspection 4/7/14	
E.1.c.(1)	In	Continuous	S,E	No testing required	
E.1.c.(2)	In	Continuous	R		
E.1.b.(4)	In	Continuous	CPM,R		
E.1.c.(3)	In	Continuous	R		
E.2.a.	In	Continuous	J,CPM,R		
E.2.b.(1)	In	Continuous	CPM,R		
E.2.c.(1)	In	Continuous	E	No testing required	
E.2.c.(2)	In	Continuous	CPM,R		
E.3.(1)	In	Continuous	S		
E.3.b.(1)	In	Continuous	CPM,R		
E.3.c.(1)	In	Continuous	R		
E.4.a.(1)	In	Continuous	E		
E.4.b.(1)	In	Continuous	S,CPM,R		
E.4.b.(2)	In	Continuous	S,CPM,R		
E.4.b.(3)	In	Continuous	S,CPM,R		
E.4.c.(1)	In	Continuous	S		
E.4.c.(2)	In	Continuous	CPM,I,S,R		
F.1.a.(1)	In	Continuous	E	8/26/14 stack test - 0.021 gr/dscf	

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Part I.	Compliance Status	Continuous or	Method(s) used to			
Permit Reference	In/Out	Intermittent Compliance	determine compliance			
F.1.a.(2)	In	Continuous	E	8/26/14 stack test - 2.3 lb/hr		
F.1.b.(1)	In	Continuous	S			
F.1.b.(2)	In	Continuous	S			
F.1.b.(3)	In	Continuous	S			
F.1.b.(4)	In	Continuous	E	Last test 8/26/14		
F.1.b.(5)	In	Continuous	CPM			
F.1.b.(6)	In	Continuous	I	Last inspection - 4/9/14		
F.1.c.(1)	In	Continuous	S			
F.1.c.(2)	In	Continuous	R			
F.1.c.(3)	In	Continuous	I,R			
F.1.b.(7)	In	Continuous	CPM,R	Redundant with F.7.b and c		
F.2.a	In	Continuous	CPM,J,S			
F.2.b.(1)	In	Continuous	CPM,R,S,I			
F.2.c.(1)	In	Continuous	E	No testing required		
F.2.c.(2)	In	Continuous	CPM,R			
F.3.a.(1)	In	Continuous	E,R			
F.3.a.(2)	In	Continuous	F			
F.3.b.(1)	In	Continuous	R, C			
F.3.c.(1)	In	Continuous	S	No testing required		
F.3.c.(2)	In	Continuous	F			
F.4.a.(1)	In	Continuous	E	Continuous except 6/26/14 - see semiannual monitoring report		
F.4.b.(1)	In	Continuous	E	Last test 8/28/12		
F.4.c.(1)	In	Continuous	S			
F.4.c.(2)	In	Continuous	R			
F.5.a.(1)	In	Continuous	S			
F.5.a.(2)	In	Continuous	F			
F.5.b.(1)	In	Continuous	R, C			
F.5.b.(2)	In	Continuous	S			
F.5.c.(1)	In	Continuous	R			
F.5.c.(2)	In	Continuous	R			
F.6.a	In	Continuous	M			
F.6.b.(1)	In	Continuous	S,R	Continuous except venting periods identified in quarterly excess emission reports		
F.6.b.(2)	In	Continuous	I,R			
F.6.b.(3)	In	Continuous	S			
F.6.b.(4)	In	Continuous	S			
F.6.c.(1)	In	Continuous	S	No testing required		
F.6.c.(2)	In	Continuous	M,S	Continuous except monitor downtime periods reported in quarterly excess emission reports		
F.6.c.(3)	In	Continuous	S,R			
F.6.c.(4)	In	Continuous	R			
F.6.c.(5)	In	Continuous	R			
F.6.c.(6)	In	Continuous	Q			
F.7.a.(1)	In	Continuous	E			
F.7.a.(2)	In	Continuous	E	8/26/14 stack test - 0.021 gr/dscf		
F.7.b.(1)	In	Continuous	S			
F.7.b.(2)	In	Continuous	CPM,R			
F.7.b.(3)	In	Continuous	CPM,R			
F.7.c.(1)	In	Continuous	S,CPM			
G.1.a	In	Continuous	E			
G.1.b.(1)	In	Continuous	S			
G.1.b.(2)	In	Continuous	I	Last inspection 4/8/14		
G.1.c.(1)	In	Continuous	S	No testing required		
G.1.c.(2)	In	Continuous	I			
G.1.c.(3)	In	Continuous	R			
G.2.a	In	Continuous	J,S			
G.2.b.(1)	In	Continuous	E,I,S,R			
G.2.c.(1)	In	Continuous	E	No testing required		

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Part I.	Compliance Status	Continuous or	Method(s) used to				
Permit Reference	In/Out	Intermittent Compliance	determine compliance				
G.2.c.(2)	In	Continuous	CPM,I,R				
G.3.(1)(a)	In	Continuous	S				
G.3.b.(1)	In	Continuous	S				
G.3.c.(1)	In	Continuous	R				
H.4.a.(1)	In	Continuous	S				
H.4.a.(2)	In	Continuous	S, T				
H.4.b.(1)	In	Continuous	CPM,R,S				
H.4.b.(2)	In	Continuous	E				
H.4.c.(1)	In	Continuous	T				
H.4.c.(2)	In	Continuous	I,R				
H.4.b.(3)	In	Continuous	CPM,R				
H.4.b.(4)	In	Continuous	S				
H.4.b.(5)	In	Continuous	S,E,R				
H.4.b.(6)	In	Continuous	CPM,R				
H.4.c.(3)	In	Continuous	I,E,CPM,R				
H.4.b.(7)	In	Continuous	T,R				
H.4.b.(8)	In	Continuous	CPM,S				
H.4.c.(4)	In	Continuous	S,R				
H.4.b.(9)	In	Continuous	R				
H.4.c.(5)	In	Continuous	S				
H.4.c.(10)	In	Continuous	E	No testing required			
H.4.c.(11)	In	Continuous	R				
H.4.c.(12)	In	Continuous	R				
H.4.c.(13)	In	Continuous	CPM,S				
H.4.b.(10)	In	Continuous	CPM,S				
H.4.b.(11)	In	Continuous	R				
H.5.a.	In	Continuous	SR,CPM				
H.5.b.(1)	In	Continuous	S				
H.5.b.(2)	In	Continuous	S				
H.5.c.(1)	In	Continuous	R				
H.5.c.(2)	In	Continuous	Q				
H.5.c.(3)	In	Continuous	S				
H.5.c.(4)	In	Continuous	E	No testing required			
I.1.(1)	In	Continuous	S				
I.1.b.(1)	In	Continuous	S				
I.1.c.(1)	In	Continuous	E	No testing required			
I.1.c.(2)	In	Continuous	R				
K.1.a.	In	Continuous	C,R				
K.1.b.(1)	In	Continuous	S				
K.1.c.(1)	In	Continuous	E	No testing required			
K.1.c.(2)	In	Continuous	R				
K.2.a.	In	Continuous	J				
K.2.b.(1)	In	Continuous	C,R,S				
K.2.c.(1)	In	Continuous	E	No testing required			
K.2.c.(2)	In	Continuous	R				
K.3.a.(1)	In	Continuous	S,R				
K.3.a.(2)	In	Continuous	R				
K.3.a.(3)	In	Continuous	R				
K.3.b.(1)	In	Continuous	R				
K.3.c.(1)	In	Continuous	E	No testing required			
K.3.c.(2)	In	Continuous	R				
K.3.c.(3)	In	Continuous	R				
K.4.a.(1)	In	Continuous	S				
K.4.c.(1)	In	Continuous	S	No testing required			
L.1.(a)(1)	Source no longer exists at site						
L.1.b.(1)	Source no longer exists at site						

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Continuous or Intermittent Compliance				Method(s) used to determine compliance	
L.1.c.(1)	Source no longer exists at site				
L.1.c.(2)	Source no longer exists at site				
L.2.a.(1)	Source no longer exists at site				
L.2.a.(2)	Source no longer exists at site				
L.2.b.(1)	Source no longer exists at site				
L.2.c.(1)	Source no longer exists at site				
L.2.c.(2)	Source no longer exists at site				
L.3.a.	Source no longer exists at site				
L.3.b.(1)	Source no longer exists at site				
L.3.c.(1)	Source no longer exists at site				
M.1.a.	Source no longer exists at site				
M.1.b.(1)	Source no longer exists at site				
M.1.c.(1)	Source no longer exists at site				
M.1.c.(2)	Source no longer exists at site				
M.2.a.	Source no longer exists at site				
M.2.b.(1)	Source no longer exists at site				
M.2.c.(1)	Source no longer exists at site				
M.2.c.(2)	Source no longer exists at site				
M.3.a.(1)	Source no longer exists at site				
M.3.a.(2)	Source no longer exists at site				
M.3.a.(3)	Source no longer exists at site				
M.3.a.(4)	Source no longer exists at site				
M.3.a.(5)	Source no longer exists at site				
M.3.a.(6)	Source no longer exists at site				
M.3.b.(1)	Source no longer exists at site				
M.3.b.(2)	Source no longer exists at site				
M.3.b.(3)	Source no longer exists at site				
M.3.c.(1)	Source no longer exists at site				
M.3.c.(2)	Source no longer exists at site				
M.3.c.(3)	Source no longer exists at site				
M.4.a.	Source no longer exists at site				
M.4.b.(1)	Source no longer exists at site				
M.4.c.(1)	Source no longer exists at site				
M.4.c.(2)	Source no longer exists at site				
M.5.a.(1)	Source no longer exists at site				
M.5.b.(1)	Source no longer exists at site				
M.5.b.(2)	Source no longer exists at site				
M.5.c.(1)	Source no longer exists at site				
M.5.c.(2)	Source no longer exists at site				
N.1.a	In	Continuous	S		
N.1.b.(1)	In	Continuous	S		
N.1.b.(2)	In	Continuous	S,R		
N.1.c.(1)	In	Continuous	R		
N.2.a.	In	Continuous	J,S		
N.2.b.(1)	In	Continuous	S,R		
N.2.c.(1)	In	Continuous	E	No testing required	
N.2.c.(2)	In	Continuous	R		
O.1.a.(1)	In	Continuous	S	No alternative fuels or raw materials were used in the reporting period.	
O.1.b.(1)	In	Continuous	R		
O.1.b.(2)	In	Continuous	N		
O.2.a.(1)	In	Continuous	S,E		
O.2.a.(2)	In	Continuous	N		
O.2.b.(1)	In	Continuous	S		
O.2.b.(2)	In	Continuous	N		
O.3.a.(1)	In	Continuous	R		
O.3.a.(2)	In	Continuous	R		

Expera Specialty-Thilmany Mill--- Operation Permit 445031180-P12				C=Calculations	M=Continuous Emissions Monitoring
Annual Compliance Summary				CPM= Continuous Parameter Monitoring	N= Notification
1/01/14 to 12/31/14				E= Emission Testing	P=Published Emission Factor
Part I. Compliance Status				F=Fuel Sampling and Analysis	Q=Quarterly Report
Permit Reference				I= Periodic Inspections	R=Recordkeeping
In/Out				J= Best Engineering Judgment	S=Standard Operating/Maintenance Procedure
Continuous or Intermittent Compliance				T= liquid sampling and analysis	
Method(s) used to determine compliance					
O.3.a.(3)	In	Continuous	R		
O.3.a.(4)	In	Continuous	R		
O.3.b.(1)	In	Continuous	R		
O.3.b.(2)	In	Continuous	R		
O.3.b.(3)	In	Continuous	R		
O.3.b.(4)	In	Continuous	R		
O.4.a.(1)	In	Continuous	S		
O.4.b.(1)	In	Continuous	R		
O.5.a.(1)	In	Continuous	F,R		
O.5.b.(1)	In	Continuous	F,R		
O.6.a.(1)	In	Continuous	R		
O.6.b.(1)	In	Continuous	C,E,R		
O.7.a.(1)	In	Continuous	S		
O.7.a.(2)	In	Continuous	S,R		
O.7.b.(1)	In	Continuous	S,R		
O.7.b.(2)	In	Continuous	S,R,N		
O.7.b.(3)	In	Continuous	S		
O.7.a.(3)	In	Continuous	S		
O.7.a.(4)	In	Continuous	S		
O.7.a.(5)	In	Continuous	S		
O.7.b.(4)	In	Continuous	S		
O.7.b.(5)	In	Continuous	S		
O.7.a.(6)	In	Continuous	J,S		
O.7.a.(7)	In	Continuous	S		
O.7.a.(8)	In	Continuous	S		
O.7.a.(9)	In	Continuous	S		
O.7.b.(6)	In	Continuous	S		
O.8.a.(1)	In	Continuous	S		
O.8.a.(2)	In	Continuous	S,R		
O.8.a.(3)	In	Continuous	S,E		
O.8.b.(1)	In	Continuous	E,S		
O.8.a.(4)	In	Continuous	S		
O.8.a.(5)	In	Continuous	M.CPM,R,S		
O.8.b.(2)	In	Continuous	R,S		
O.8.b.(3)	In	Continuous	R		
O.8.b.(4)	In	Continuous	CPM,R		
O.8.b.(5)	In	Continuous	N	none of the actions were taken	
O.8.b.(6)	In	Continuous	C,R,N		
O.8.b.(7)	In	Continuous	Q		
O.8.b.(8)	In	Continuous	R		
O.8.b.(9)	In	Continuous	S		
O.9.a.(1)	In	Continuous	E	Emission test occurred on 12/2/09	
O.9.a.(2)	In	Continuous	N	Ave emission rate was .04 lbs/MMBTU	
O.10.a.(1)	In	Continuous	C,R		
O.10.b.(1)	In	Continuous	R		